| In re Dimensions In Senior Living, LLC et al., <sup>1</sup> | ) | Case No. 22-80860  |
|---|---|--------------------|
| Debtors.  | ) | Chapter 11         |
|   | ) | Joint Administered |

# FIRST APPLICATION OF DEBTOR'S COUNSEL, TURNER LEGAL GROUP, FOR INTERIM APPROVAL OF FEES AND EXPENSES

COMES NOW Turner Legal Group, LLC ("Applicant"), pursuant to Fed. R. Bank. P. 2016 and Neb. R. Bank. P. 2016-1, 11 U.S.C. § 330, and the Motion to Approve Procedures for Interim Compensation and Reimbursement of Professional Fees previously entered and approved by this Court, the undersigned submits this First Application for Interim Approval of Fee and Expense for Debtors' Counsel.

#### **BACKGROUND**

- 1. On November 21, 2022, (the "Petition Date"), Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. This Court has jurisdiction over this case pursuant to 28 U.S.C. §1334. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. No party has requested the appointment of a trustee or examiner in the Chapter 11 Cases, and no committees have been appointed or designated.
- 2. On November 23, 2022, Debtor filed it *Motion To Approve Procedures For Interim Compensation And Reimbursement Of Professional Fees* at Filing No. 17, which motion was approved by this Court on December 28, 2022, at Filing No. 71 (the "Procedures"). In accordance with the Procedure, Applicant submits this First Application for Interim Approval of Fee and Expenses of Attorney's Fees and Expenses of actual and necessary costs and expenses incurred by Applicant as Counsel to Debtor from November 21, 2022, to March 31, 2023 (the "Period").
- 3. Applicant was employed by Debtor on an hourly basis for the purpose of representing Debtor in the conduct of these Chapter 11 Case and its business affairs. Applicant was employed to perform all services as were necessary or reasonable for and on behalf of Debtor on an hourly basis, with no budget or limitation being imposed upon services rendered or fees incurred in connection therewith.
- 4. Applicant has previously submitted Monthly Applications for November 2022, December 2022, January 2023, and February 2023. This is Applicant's First Interim Application and includes fees and expenses for March 2023.
- 5. Applicant received a retainer in the amount of \$68,750.00 for the purpose of securing payment of legal services provided to Debtors in connection with the Chapter 11 Cases. Of this amount: (i) \$12,166.00 was reserved solely for paying for Chapter 11 Bankruptcy Filing fees; and (ii) \$5,334.00 was reserved solely for paying for printing, postage, and other service and notice requirements associated with

<sup>&</sup>lt;sup>1</sup> Dimensions In Senior Living, LLC, Tax I.D. No. 76-0771058, Village ridge, LLC, Tax I.D. NO. 20-3042744, Village Place, LLC, Tax I.D. NO. 81-2042780, Wb Real Estate Of Iola, LLC, Tax I.D. NO. 46-5548614, Humboldt Assisted Living LLC, Tax I.D. NO. 48-1221950, Wilcox Properties Of Columbia, LLC, Tax I.D. NO. 43-1934089, Wilcox Properties Of Fort Calhoun, LLC, Tax I.D. NO. 20-5822304.

any filed Chapter 11 Bankruptcies. As of the Petition Date, \$13,590.00 + \$12,166.00 of the Retainer was used to satisfy the outstanding fees and expenses owed to the Firm. (Dkt. 18). Post-Petition fees are currently being paid by one or more of the Debtors in this consolidated case. The Firm retains \$42,944.00 in trust.

- 6. Debtor has been given an opportunity to review this First Application for Approval of Interim Fees and Expenses as well as all previous Monthly Fee Applications filed by Applicant.
- 7. On or around January 19, 2023 the Applicant remitted a statement to the reviewing parties for \$21,030.00 for services rendered by Applicant from November 21, 2022 to December 31, 2022 and for expenses incurred by Applicant in connection with these services in the amount of \$1395.00. That statement approved eighty percent (80%) of the value of the services rendered (80% of \$21,030.00 = \$16,824.00), and one-hundred percent (100%) of the value of the expenses (\$1,395.00). The remaining twenty percent (20%) of the value of the services rendered (\$4,206.00) remains payable pending fee application and court order. (Dkt. 95). No objections to this fee statement were filed. Debtors have paid the Firm \$16,824.00 in fees and \$1,395.00 in expenses towards these amounts. Of this amount, \$4,206.00 remains outstanding.
- 8. On or around March 30, 2023, the Applicant remitted a statement to the reviewing parties for \$15,410.00 for services rendered by Applicant from January 1 to January 31, 2023 and for expenses incurred by Applicant in connection with these services in the amount of \$0. That statement approved eighty percent (80%) of the value of the services rendered ((80% of \$15,410 = \$12,328.00), and one-hundred percent (100%) of the value of the expenses (\$0.00). The remaining twenty percent (20%) of the value of the services rendered (\$3,082.00) remains payable pending fee application and court order. (Dkt. 169). No objections to this fee statement were filed. Of this amount, \$15,410.00 remains outstanding.
- 9. On or around March 30, 2023, the Applicant remitted a statement to the reviewing parties for \$14,166.00 for services rendered by Applicant from February 1 to 28, 2023 and for expenses incurred by Applicant in connection with these services in the amount of \$494.94. That statement approved eighty percent (80%) of the value of the services rendered ((80% of \$14,116.00 = \$11,292.80), and one-hundred percent (100%) of the value of the expenses (\$494.94). The remaining twenty percent (20%) of the value of the services rendered (\$282.20) remains payable pending fee application and court order. (Dkt. 170). No objections to this fee statement were filed. Of this amount, \$14,610.94 remains outstanding
- 10. This application also includes services rendered by Applicant from March 1 to March 31, 2023, in the amount of \$9,865.00 and \$0.00 for expenses in connection with these services, which amount remains payable in the amount of \$9,856.00 pending this Fee Application and court order.
- 11. The names and hourly rates of all of Applicant's attorneys, paralegals and legal assistants who billed time with respect to this case are as set forth on Exhibit "A", as attached hereto and by this reference incorporated herein. The hourly rates reflected on Exhibit "A" are the customary and standard hourly rates for such attorneys, paralegals and legal assistants. The average hourly rate charged by Applicant to Debtor during the Period ranges between \$100.00/h to \$310.00/h.
- 12. Attached hereto as Exhibit "B" is a break-down by project code that includes the numbers of hours spent by Applicant per ABA Bankruptcy Code project categories. A Copy of a condensed invoice is set forth on Exhibit "C" attached hereto.
- 13. All services for which compensation is requested by Applicant were performed for and on behalf of Debtor and not on behalf of any other person. The services rendered by Applicant in this case

were necessary and have aided in the collection, preservation, and sale of the assets of the estates, and the orderly administration thereof.

- 14. The reasonable value of the services rendered by Applicant as counsel for Debtor in this Chapter 11 case during the Period is \$60,412.00. Applicant has received payment in the amount of \$16,824.00 as of the date of this filing. Of this amount, \$43,588.00 remains outstanding.
- 15. Applicant has expended the sum of \$1,889.94 for actual and necessary costs and expenses incurred by Applicant as counsel to Debtor during the Period. Of this amount \$494.94 remains outstanding.
- 16. Set forth on Exhibit "A" is a detailed listing of Applicant's out-of-pocket expenses incurred with reference to this case.

## **CASE STATUS**

- 17. The Plans and Disclosure Statements have not yet been filed in this case. Debtors intend to file multiple plans and disclosure statements following the sale process described below.
  - 18. All UST Quarterly Fees are current and all Monthly Operating Reports have been filed.
- 19. On February 6, 2023, Debtors filed there: (i) Motion For Order Approving Bidding Procedures To Be Used In Relation To The Proposed Sale Of Debtors Assets (Filing No. 130) (the "Procedures Motion"); and (ii) their Motion For Order Pursuant To 11 U.S.C. §§ 105(a) and 365 And fed. R. Bank p. 6006 Authorizing And Approving Procedures Governing The Assumption And Assignment Of Executory Contracts And Unexpired Leases (Filing No. 131) (the "Assumption Motion").
- 20. The Assumption Motion was approved by Order of the Court on March 10, 2023. Filing No. 154. The Procedures Motion was approved by Order of the Court on March 10, 2023. Filing No. 161.
- 21. During this time, Debtors' Financial Advisor, B. Riley Advisory Services, has undertaken a substantial marketing process that is generating substantial interest in Debtors' assets as a going concern.<sup>2</sup> As things stand, the Procedures Motion calls for a bid deadline of May 15, 2023, and an auction to occur on May 25, 2023 (with a sale hearing to occur thereafter). While these deadlines remain subject to change, no such change is contemplated as of today's date. Following this sale process, Debtors intend to file one or more plans of reorganization and disclosure statements.
- 22. At the same time, Debtors retained the services of Paul Land and Plaza Commercial Realty to act as a licensed real estate broker to market the assets of Wilcox Properties of Columbia, LLC ("Columbia"). The sale of Columbia's assets as has resulted in multiple offers, but no decision on accepting any particular offer has been made due to an outstanding and substantial property insurance claim. Columbia believes it will have sufficient information from its insurance company to move forward with the selection of an appropriate purchase offer in the near future.

## **CONCLUSION**

23. Applicant requests that the Court approve this fee application pursuant to 11 U.S.C. § 330 as fees and expenses which were reasonable, actual and necessary to the administration of the bankruptcy estate.

<sup>&</sup>lt;sup>2</sup> B. Riley is not, however, actively marketing the assets of Wilcox Properties of Columbia, LLC.

Dated this 17th day of May, 2023.

By: /s Patrick Turner
Patrick R. Turner (#23461)
Turner Legal Group, LLC
139 S. 144<sup>th</sup> Street, #665
Omaha, NE 68010
Tel: 402-690-3675

pturner@turnerlegalomaha.com

Counsel for Debtor.

| In re Dimensions In Senior Living, LLC et al., | ) | Case No. 22-80860  |
|--|---|--------------------|
| Debtors.                                       | ) | Chapter 11         |
|  | ) | Joint Administered |

## Exhibit "A"

## **SUMMARY SHEET**

- 1. Total Compensation and Expenses Currently Requested in this Application
  - a. Fees \$60,412.00 (100% Amount listed)
  - b. Expenses \$1,889.94
- 2. Total Compensation and Expenses Previously Requested
  - a. Fees \$48,329.60 (80% Amount requested in Monthly Fee Applications)
  - b. Expenses \$1,889.84
- 3. Total Compensation and Expenses Previously Awarded by the Court
  - a. Fees N/A
  - b. Expenses N/A
- 4. Name and Current Billing Rate for each person who billed time during period, total hours billed, average billing rate, and total fees billed:

| Timekeeper Name   | Role      | Work Hours | Work Rate | Work Amount |
|-------------------|-----------|------------|-----------|-------------|
| Turner, Patrick R | Attorney  | 179.20     | \$302.74  | \$54,252.00 |
| Jenna Taylor      | Paralegal | 61.6       | \$100.00  | \$6,160.00  |
| Total             |           | 240.8      |           | \$60,412.00 |

5. Detailed listing of Applicant's out-of-pocket expenses incurred with reference to this case:

| Work<br>Date | Cost Tyne                          |          |
|--------------|------------------------------------|----------|
| 11/25/2022   | Printing, Postage and Mailing Fees | \$319.68 |
| 11/25/2022   | Printing, Postage and Mailing Fees | \$98.91  |
| 11/25/2022   | Printing, Postage and Mailing Fees | \$98.91  |
| 11/25/2022   | Printing, Postage and Mailing Fees | \$103.62 |
| 12/9/2022    | Printing, Postage and Mailing Fees | \$236.67 |
| 12/9/2022    | Printing, Postage and Mailing Fees | \$537.21 |
| 2/17/2023    | Postage                            | \$494.94 |
| Total        |                                    | 1,889.94 |
|              |                                    |          |

| In re Dimensions In Senior Living, LLC et al., | _ ) | Case No. 22-80860  |
|--|-----|--------------------|
| Debtors.                                       | )   | Chapter 11         |
|  | )   | Joint Administered |

## Exhibit "B"

## **Project Codes**

| Task-Code | Task                                       | Work Hours | Work Amount |
|-----------|--|------------|-------------|
| B110      | B110 Case Administration.                  | 77.4       | \$13,581.00 |
| B130      | B130 Asset Disposition.                    | 20.3       | \$6160.00   |
|           | B140 Relief from Stay/Adequate Protection  |            |             |
| B140      | Proceedings.                               | 22.6       | \$6961.00   |
|           | B150 Meetings of and Communications with   |            |             |
| B150      | Creditors.                                 | 3.7        | \$790       |
| B160      | B160 Fee/Employment Applications.          | 10.7       | \$1070      |
| B210      | B210 Business Operations.                  | 87.9       | \$26,575.00 |
| B230      | B230 Financing/Cash Collections.           | 13.3       | \$3990      |
| B310      | B310 Claims Administration and Objections. | 4.9        | \$1285.00   |
|           |  |            |             |
| Total     |  | 240.80     | \$60,412.00 |

| In re Dimensions In Senior Living, LLC et al., | ) | Case No. 22-80860  |
|--|---|--------------------|
| Debtors.                                       | ) | Chapter 11         |
|  | ) | Joint Administered |

Exhibit "C"

**INVOICES** 

# Turner Legal Group, LLC

**INVOICE** 

139 S. 144TH STREET #665 Omaha, 68010 pturner@turnerlegalomaha.com/ https://turnerlegalomaha.com/ O: 4026903675

# Number 499 Issue Date 12/15/2022 Due Date 1/15/2023 Email amyburns@dimsrlvg.com

## Bill To:

Amy Wilcox-Burns O: (402) 898-1079

## Time Entries

| Time Entries  | Billed By      | Rate     | Hours | Sub      |
|---|----------------|----------|-------|----------|
| Time  | Patrick Turner | \$300.00 | 0.20  | \$60.00  |
| 11/23/2022  |                |          |       |          |
| B210. Call with Mr. Peil re investment banker services.                 |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 2.70  | \$810.00 |
| 11/23/2022  |                |          |       |          |
| B210. Continuing to prepare and file various first day motions.         |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.50  | \$150.00 |
| 11/23/2022  |                |          |       |          |
| B210. Addressing identifying possible brokers.                          |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.30  | \$90.00  |
| 11/23/2022  |                |          |       |          |
| B210. Finalizing and filing suggestion in BK.                           |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.20  | \$60.00  |
| 11/23/2022  |                |          |       |          |
| B210. Call with potential asset broker.                                 |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.50  | \$150.00 |
| 11/28/2022  |                |          |       |          |
| B230. Calls with Mr. Knickrehm re DISL cash collateral issues.          |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.50  | \$150.00 |
| 11/28/2022  |                |          |       |          |
| B210. Calls with Mr. Heiman re DISL restructuring issues.               |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.30  | \$90.00  |
| 11/28/2022  |                |          |       |          |
| B230. Call with Mr. Tomjack re 1st Hospitality cash issues.             |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.60  | \$180.00 |
| 11/28/2022  |                |          |       |          |
| B210. Call with Ms. Wilcox-Burns re DISL restructuring issues.          |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 2.90  | \$870.00 |
| 11/28/2022  |                |          |       |          |
| B230. Preparing for and participating in hearing re cash collateral and |                |          |       |          |
| other motions.  |                |          |       |          |
| Time  | Patrick Turner | \$300.00 | 0.70  | \$210.00 |
| 11/28/2022  |                |          |       |          |
| R110 Addressing Creditor Service issues remotion to limit notice        |                |          |       |          |

B110. Addressing Creditor Service issues re motion to limit notice.

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| Case 22-80860-BSK Doc 19  | 97 Filed 05/17/23 En<br>Document Bille Page 9 | tered 05/17/23 1<br>of 36 Rate | L1:12:39<br>Hours | Desc Main<br>Sub |
|---|---|--------------------------------|-------------------|------------------|
| Time<br>11/28/2022<br>B210. Addressing broker selection issues and other    | Patrick Turner                                | \$300.00                       | 0.80              | \$240.00         |
| Time<br>11/28/2022<br>B210. Reviewing correspondence to staff and resider   | Patrick Turner                                | \$300.00                       | 0.30              | \$90.00          |
| Time<br>11/29/2022<br>B210. Revising resident letter re BK filings.         | Patrick Turner                                | \$300.00                       | 0.20              | \$60.00          |
| Time<br>11/29/2022<br>B230. Calls with Mr. Tomjack re 1st Hospitality cash  | Patrick Turner issues.                        | \$300.00                       | 0.50              | \$150.00         |
| Time<br>11/29/2022<br>B210. Addressing Residex threat to terminate service  | Patrick Turner                                | \$300.00                       | 0.20              | \$60.00          |
| Time<br>11/30/2022<br>B210. Call with Gibbins Advisors re possible engager  | Patrick Turner                                | \$300.00                       | 0.20              | \$60.00          |
| Time<br>11/30/2022<br>B210. Reviewing title reports.                        | Patrick Turner                                | \$300.00                       | 0.90              | \$270.00         |
| Time<br>11/30/2022<br>B210. Call with Mr. Bailey re possible asset purchase | Patrick Turner<br>e.                          | \$300.00                       | 0.20              | \$60.00          |
| Time<br>11/30/2022<br>B210. Addressing Residex termination threat.          | Patrick Turner                                | \$300.00                       | 0.40              | \$120.00         |
|   |   | Time Entries<br>Total          | 13.10             | \$3,930.00       |
| expenses  | B.W. 1.B.                                     | р.:                            | 0.                |                  |
| Expense E108 11/25/2022 Printing and Postage and Mailing Fees.              | Billed By Patrick Turner                      | Price<br>\$98.91               | Qty<br>1.00       | Sub<br>\$98.91   |
| E108<br>11/25/2022<br>Printing and Postage and Mailing Fees.                | Patrick Turner                                | \$98.91                        | 1.00              | \$98.91          |
| E108<br>11/25/2022<br>Printing and Postage and Mailing Fees.                | Patrick Turner                                | \$103.62                       | 1.00              | \$103.62         |
| E108<br>11/25/2022<br>Printing and Postage and Mailing Fees.                | Patrick Turner                                | \$319.68                       | 1.00              | \$319.68         |
|   |   | Expenses Total:                | 4.00              | \$621.12         |

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Case 22-80860-BSK Doc 197 Filed 05/17/23 Entered 05/17/23 11:12:39 Desc Main Document Page 10 of 36 Total (USD) \$4,551.12

Payment 1358 4/17/2023 \$-3,765.12

Transfer from Trust Account

Balance \$786.00

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# Turner Legal Group, LLC

**INVOICE** 

139 S. 144TH STREET #665 Omaha, 68010 pturner@turnerlegalomaha.com/ https://turnerlegalomaha.com/ O: 4026903675

# Number 500 Issue Date 1/16/2023 Due Date 2/15/2023 Email amyburns@dimsrlvg.com

## Bill To:

Amy Wilcox-Burns O: (402) 898-1079

## Time Entries

| Time Entries  | Billed By      | Rate     | Hours | Sub      |
|---|----------------|----------|-------|----------|
| Time 12/1/2022 B210. Reviewing correspondence from Mr. Winters re Gibbins Advisor services.                 | Patrick Turner | \$300.00 | 0.20  | \$60.00  |
| Time 12/1/2022 B210. Addressing schedules and SOFA and analyzing current information and assessing needs.   | Patrick Turner | \$300.00 | 1.80  | \$540.00 |
| Time 12/1/2022 B110. Addressing combined list of 20 largest creditors re motion to limit notice compliance. | Patrick Turner | \$300.00 | 0.90  | \$270.00 |
| Time 12/1/2022 B110. Addressing IDI scheduling and document requests.                                       | Patrick Turner | \$300.00 | 0.80  | \$240.00 |
| Time 12/1/2022 B110. Call with Ms. Taylor re DISL schedules and relates issues.                             | Patrick Turner | \$300.00 | 0.40  | \$120.00 |
| Time 12/2/2022 B210. Addressing status of committee appointment.  | Patrick Turner | \$300.00 | 0.30  | \$90.00  |
| Time 12/4/2022 B130. Addressing retention of brokers and correspondence with Mr. Peil.                      | Patrick Turner | \$300.00 | 0.20  | \$60.00  |
| Time 12/5/2022 B210. Addressing Motion to Extend Time to File Schedules.                                    | Patrick Turner | \$300.00 | 0.40  | \$120.00 |
| Time<br>12/5/2022<br>B230. Addressing Cash Collateral order.  | Patrick Turner | \$300.00 | 0.80  | \$240.00 |
| Time 12/5/2022 P130 Poviousing Pilou angagement letter  | Patrick Turner | \$300.00 | 0.40  | \$120.00 |

B130. Reviewing Riley engagement letter.

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|  | 5/17/23 Ente<br>Bill <b>₽ a</b> ge 12 c | red 05/17/23 11<br>of 36 Rate | L:12:39<br>Hours | Desc Main<br>Sul |
|--|---|-------------------------------|------------------|------------------|
| Time 12/5/2022 B210. Addressing possible need to reject contracts and review of the same.                                  | Patrick Turner                          | \$300.00                      | 0.70             | \$210.0          |
| Time<br>12/6/2022<br>B110. Addressing Utilities Motion and related service issues.   | Patrick Turner                          | \$300.00                      | 0.50             | \$150.0          |
| Time<br>12/6/2022<br>B110. Addressing IDI document request and review.   | Patrick Turner                          | \$300.00                      | 0.80             | \$240.0          |
| Time<br>12/6/2022<br>B210. Call with Mr. Knickrehm re DISL loan issues.  | Patrick Turner                          | \$300.00                      | 0.50             | \$150.0          |
| Time<br>12/7/2022<br>B110. Call with Ms. Taylor re DISL schedules and relates issues.                                      | Patrick Turner                          | \$300.00                      | 0.50             | \$150.0          |
| Time 12/7/2022 B210. Multiple correspondence to and from DISL working group re outstanding issues and resolutions to same. | Patrick Turner                          | \$300.00                      | 0.40             | \$120.00         |
| Time<br>12/7/2022<br>B110. Preparing for IDI and document production for same.   | Patrick Turner                          | \$300.00                      | 1.20             | \$360.0          |
| Time 12/7/2022 B110. Addressing ongoing service list needs and revisions.  | Patrick Turner                          | \$300.00                      | 0.60             | \$180.0          |
| Time 12/7/2022 B110. Addressing filing and service of cash management motions and related pleadings.                       | Patrick Turner                          | \$300.00                      | 1.40             | \$420.0          |
| Time 12/7/2022 B110. Review of docket report credit matrix claims register and initial filings. Billed by Jenna Taylor.    | Patrick Turner                          | \$100.00                      | 0.50             | \$50.0           |
| Time<br>12/7/2022<br>B110. Conference with PT to discuss case. Billed by Jenna Taylor.                                     | Patrick Turner                          | \$100.00                      | 0.50             | \$50.0           |
| Time<br>12/8/2022<br>B210. Attending IDI.  | Patrick Turner                          | \$300.00                      | 0.90             | \$270.0          |
| Time<br>12/8/2022<br>B210. Addressing Motion to Hold Stay Inapplicable filed by Champions.                                 | Patrick Turner                          | \$300.00                      | 0.40             | \$120.0          |
| Time<br>12/8/2022<br>B210. Coordinating meeting and agenda with ANB.   | Patrick Turner                          | \$300.00                      | 0.30             | \$90.0           |
| Time<br>12/8/2022<br>B110. Preparing for and attending IDI.  | Patrick Turner                          | \$300.00                      | 1.10             | \$330.0          |
| Time<br>12/8/2022  | Patrick Turner                          | \$300.00                      | 0.80             | \$240.0          |

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B210. Addressing and coordinating inquiries re property appraisals.

|  | 5/17/23 Ente<br>Bill <b>₽âge 13</b> ( | ered 05/17/23 11<br>of 36 Rate | L:12:39 [<br>Hours | Desc Main<br>Sub |
|--|---------------------------------------|--------------------------------|--------------------|------------------|
| Time 12/9/2022 B210. Continuing addressing and coordinating inquiries re property appraisals.  | Patrick Turner                        | \$300.00                       | 0.60               | \$180.00         |
| Time 12/9/2022 B110. Addressing service list preparation and review for limited notice compliance.   | Patrick Turner                        | \$300.00                       | 0.90               | \$270.00         |
| Time 12/12/2022 B110. Imported Best-case files for all debtors and initial review of filings. Billed by Jenna Taylor.  | Patrick Turner                        | \$100.00                       | 0.30               | \$30.00          |
| Time<br>12/12/2022<br>B210. Addressing coordination of property appraisals.  | Patrick Turner                        | \$300.00                       | 0.70               | \$210.00         |
| Time 12/12/2022 B210. Addressing access to Debtor records for Ms. Taylor.  | Patrick Turner                        | \$300.00                       | 0.20               | \$60.00          |
| Time<br>12/12/2022<br>B130. Drafting NDA for possible buyer.   | Patrick Turner                        | \$300.00                       | 0.70               | \$210.00         |
| Time 12/12/2022 B210. Addressing ongoing lawsuit against Debtors and Mr. Ryan and options to stay same.  | Patrick Turner                        | \$300.00                       | 1.10               | \$330.00         |
| Time<br>12/13/2022<br>B230. Call with Mr. Zlutiky re Fannie Mae claims and insurance issues.   | Patrick Turner                        | \$300.00                       | 0.20               | \$60.00          |
| Time<br>12/13/2022<br>B210. Addressing Village Ridge insurance lapse issues.   | Patrick Turner                        | \$300.00                       | 0.50               | \$150.00         |
| Time 12/13/2022 B210. Reviewing and addressing appraiser request for information.  | Patrick Turner                        | \$300.00                       | 0.30               | \$90.00          |
| Time 12/13/2022 B210. Addressing state court lawsuit re Debtors and Mr. Ryan and Champions.  | Patrick Turner                        | \$300.00                       | 0.30               | \$90.00          |
| Time 12/14/2022 B110. Review of UCC-1 filing leases questionnaires management agreements certificate of insurance vendor lists and other business documents needed to prepare schedules. Billed by Jenna Taylor. | Patrick Turner                        | \$100.00                       | 2.50               | \$250.00         |
| Time 12/14/2022 B210. Correspondence to and from Mr. Zluticky re Village Ridge insurance issues.   | Patrick Turner                        | \$300.00                       | 0.20               | \$60.00          |
| Time<br>12/15/2022<br>B130 Call with Mr. Peil re Riley engagement.   | Patrick Turner                        | \$300.00                       | 0.10               | \$30.00          |
| Time 12/15/2022 B210. Call with Ms. Taylor re DISL schedules.  | Patrick Turner                        | \$300.00                       | 0.20               | \$60.00          |

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| Case 22-80860-BSK Doc 197 Filed 05 Time Entries Document   | 5/17/23 Entere<br>Bill <b>₽å</b> ge 14 of | ed 05/17/23 11<br>36 Rate | .:12:39 D<br>Hours | esc Main<br>Sub |
|--|---|---------------------------|--------------------|-----------------|
| Time 12/15/2022 B210. Continuing coordination of property appraisals with appraisers and ANB.                                    | Patrick Turner                            | \$300.00                  | 0.80               | \$240.00        |
| Time<br>12/15/2022<br>B210. Researching appointment of Healthcare Ombudsman.   | Patrick Turner                            | \$300.00                  | 0.70               | \$210.00        |
| Time<br>12/15/2022<br>B210. Addressing revisions to B Riley engagement.  | Patrick Turner                            | \$300.00                  | 0.80               | \$240.00        |
| Time<br>12/15/2022<br>B210. Reviewing FC property report.  | Patrick Turner                            | \$300.00                  | 0.30               | \$90.00         |
| Time 12/15/2022 B110. Working on initial draft schedules and sofa for Dimensions LLC. Billed by Jenna Taylor.                    | Patrick Turner                            | \$100.00                  | 1.00               | \$100.00        |
| Time<br>12/15/2022<br>B110. working on initial draft schedules and sofa for Humboldt assisted<br>living. Billed by Jenna Taylor. | Patrick Turner                            | \$100.00                  | 0.60               | \$60.00         |
| Time<br>12/15/2022<br>B110. Working on initial draft schedules for Village Place LLC. Billed by<br>Jenna Taylor.                 | Patrick Turner                            | \$100.00                  | 0.60               | \$60.00         |
| Time 12/15/2022 B110. working on initial draft schedules for Village Ridge. Billed by Jenna Taylor.                              | Patrick Turner                            | \$100.00                  | 0.70               | \$70.00         |
| Time 12/15/2022 B110. working on initial draft schedules for WB Real Estate of Iola. Billed by Jenna Taylor.                     | Patrick Turner                            | \$100.00                  | 0.70               | \$70.00         |
| Time 12/15/2022 B110. working on initial draft of schedules for Wilcox Properties of Fort Calhoun. Billed by Jenna Taylor.       | Patrick Turner                            | \$100.00                  | 0.70               | \$70.00         |
| Time 12/15/2022 B110. working on initial draft of schedules for Wilcox Properties of Colombia. Billed by Jenna Taylor.           | Patrick Turner                            | \$100.00                  | 0.70               | \$70.00         |
| Time 12/16/2022 B110. comparison of claims register to scheduled creditors for all debtors. Billed by Jenna Taylor.              | Patrick Turner                            | \$100.00                  | 1.00               | \$100.00        |
| Time 12/16/2022 B110. due diligence review of property ownership and LLC ownership. Billed by Jenna Taylor.                      | Patrick Turner                            | \$100.00                  | 0.50               | \$50.00         |
| Time<br>12/16/2022   | Patrick Turner                            | \$300.00                  | 0.20               | \$60.00         |

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B210. Call with Signal 88 re overnight security services.

|  | 5/17/23 Enter<br>t <sup>Bill</sup> <b>₽</b> åge 15 of | red 05/17/23 1<br>f 36 Rate | Hours | Desc Main |
|--|---|-----------------------------|-------|-----------|
| Time<br>12/16/2022<br>B210. Call with Signal 88 re overnight security services.  | Patrick Turner  | \$300.00                    | 0.40  | \$120.00  |
| Time<br>12/16/2022<br>B130. Addressing and negotiating B Riley engagement with<br>correspondence and calls to and from Mr. Peil and clients. | Patrick Turner  | \$300.00                    | 1.10  | \$330.00  |
| Time<br>12/16/2022<br>B110. Reviewing Missouri AG request for information and research of<br>impact of stay on same.                         | Patrick Turner  | \$300.00                    | 0.60  | \$180.00  |
| Time<br>12/16/2022<br>B210. Addressing and resolving cash withdraws from ANB re loan<br>payments.  | Patrick Turner  | \$300.00                    | 0.30  | \$90.00   |
| Time<br>12/16/2022<br>B110. Addressing BK schedules and SOFA.  | Patrick Turner  | \$300.00                    | 0.80  | \$240.00  |
| Time 12/18/2022 B110. review of title searches on real property of debtors and updated schedules with information. Billed by Jenna Taylor.   | Patrick Turner  | \$100.00                    | 1.00  | \$100.00  |
| Time<br>12/19/2022<br>B210. Reviewing and addressing Johnson Fire Control lawsuit.   | Patrick Turner  | \$300.00                    | 0.60  | \$180.00  |
| Time<br>12/19/2022<br>B130. Addressing B Riley engagement terms negotiation.   | Patrick Turner  | \$300.00                    | 0.40  | \$120.00  |
| Time<br>12/19/2022<br>B210. Addressing and analyzing appointment of ombudsman.   | Patrick Turner  | \$300.00                    | 0.80  | \$240.00  |
| Time<br>12/19/2022<br>B210. Continuing to address schedules and SOFA.  | Patrick Turner  | \$300.00                    | 0.90  | \$270.00  |
| Time<br>12/19/2022<br>B210. Coordinating call with possible buyer.   | Patrick Turner  | \$300.00                    | 0.20  | \$60.00   |
| Time<br>12/20/2022<br>B130. Addressing inquiry from Mr. Catt re status of sale process.  | Patrick Turner  | \$300.00                    | 0.20  | \$60.00   |
| Time<br>12/20/2022<br>B130. Preparing for and attending call with potential broker.  | Patrick Turner  | \$300.00                    | 0.80  | \$240.00  |
| Time<br>12/20/2022<br>B110. Addressing schedules and preparation of same.  | Patrick Turner  | \$300.00                    | 0.90  | \$270.00  |
| Time<br>12/20/2022<br>B210. Reviewing R2004 notices.   | Patrick Turner  | \$300.00                    | 0.80  | \$240.00  |

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| Case 22-80860-BSK Doc 197 Filed 05 Time Entries Document  | 5/17/23 Ente   | red 05/17/23 11<br>of 36 Rate | L:12:39<br>Hours | Desc Main<br>Sub |
|---|----------------|-------------------------------|------------------|------------------|
| Time 12/20/2022 B110. Continuation on statement of financial affairs. Continuation on schedule B and G. Review of information provided by client in order to complete bankruptcy forms. Billed by Jenna Taylor.   | Patrick Turner | \$100.00                      | 2.50             | \$250.00         |
| Time<br>12/21/2022<br>B130. Addressing efforts to value and sell Columbia property.   | Patrick Turner | \$300.00                      | 0.50             | \$150.00         |
| Time<br>12/21/2022<br>B110. Addressing application to employ B Riley.   | Patrick Turner | \$300.00                      | 1.40             | \$420.00         |
| Time<br>12/21/2022<br>B110. Addressing application to employ E&S.   | Patrick Turner | \$300.00                      | 0.50             | \$150.00         |
| Time 12/21/2022 B210. Addressing Motion for Reconsideration re Champions NE law suit.   | Patrick Turner | \$300.00                      | 0.50             | \$150.00         |
| Time<br>12/22/2022<br>B210. Researching requirements re responding to R2004 exam.   | Patrick Turner | \$300.00                      | 0.60             | \$180.00         |
| Time<br>12/22/2022<br>B210. Addressing ongoing inquires re property appraisals.   | Patrick Turner | \$300.00                      | 0.30             | \$90.00          |
| Time 12/27/2022 B110. Continuation on statement of financial affairs and schedule B complete bankruptcy forms. Billed by Jenna Taylor.  | Patrick Turner | \$100.00                      | 3.70             | \$370.00         |
| Time 12/27/2022 B110. Conference with PT to discuss case. Billed by Jenna Taylor.   | Patrick Turner | \$100.00                      | 0.50             | \$50.00          |
| Time<br>12/27/2022<br>B210. Addressing reports of water damage at Columbia facility.  | Patrick Turner | \$300.00                      | 0.20             | \$60.00          |
| Time 12/27/2022 B210. Addressing and reviewing schedules and SOFAs and related documents.   | Patrick Turner | \$300.00                      | 2.50             | \$750.00         |
| Time<br>12/28/2022<br>B210. Continuing preparing and reviewing schedules and attachments.   | Patrick Turner | \$300.00                      | 0.90             | \$270.00         |
| Time 12/28/2022 B110. Emails with AWB. Continuation on schedule B and G and statement of financial affairs. Updated schedule G and review of information provided by client in order to complete bankruptcy forms and creation of attachments to schedule and SOFA. Billed by Jenna Taylor. | Patrick Turner | \$100.00                      | 3.50             | \$350.00         |
| Time 12/28/2022 B110. Updated list of missing items and questions to discuss with debtor and PT and follow up emails regarding the same. Billed by Jenna  | Patrick Turner | \$100.00                      | 0.60             | \$60.00          |

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Taylor.

|  | 5/17/23 Ente<br>Bill <b>₽a</b> ge 17 ( | ered 05/17/23 13<br>of 36 Rate | 1:12:39<br>Hours | Desc Main   |
|--|--|--------------------------------|------------------|-------------|
| Time 12/29/2022 B110. Continuation on schedule B personal property and sofa for all debtors. Call with PT and emails to AWB. Billed by Jenna Taylor. | Patrick Turner                         | \$100.00                       | 2.80             | \$280.00    |
| Time<br>12/29/2022<br>B210. Addressing and researching insurance proceeds issues.  | Patrick Turner                         | \$300.00                       | 0.70             | \$210.00    |
| Time<br>12/29/2022<br>B210. Addressing Village Ridge insurance premium issues.   | Patrick Turner                         | \$300.00                       | 0.30             | \$90.00     |
| Time 12/29/2022 B110. Addressing E&S application to employ.  | Patrick Turner                         | \$300.00                       | 0.70             | \$210.00    |
| Time 12/30/2022 B210. Addressing MO Atty General and Anglen claim.   | Patrick Turner                         | \$300.00                       | 0.30             | \$90.00     |
| Time 12/30/2022 B210. Addressing and resolving Cash Collateral Motion and Order and possible service issues.   | Patrick Turner                         | \$300.00                       | 0.30             | \$90.00     |
| Time<br>12/30/2022<br>B210. Addressing and resolving Village Ridge insurance issues.   | Patrick Turner                         | \$300.00                       | 0.30             | \$90.00     |
| Time 12/30/2022 B210. Addressing Humboldt utility inquiry and resolution of possible objection to Utilities Motion.                                  | Patrick Turner                         | \$300.00                       | 0.30             | \$90.00     |
| Time<br>12/30/2022<br>B130. Addressing possible sale of Columbia Property.   | Patrick Turner                         | \$300.00                       | 0.30             | \$90.00     |
| Time<br>12/30/2022<br>B210. Reviewing draft schedules.   | Patrick Turner                         | \$300.00                       | 1.60             | \$480.00    |
| Time 12/30/2022 B110. Final drafts with attachments. Discussions with PT regarding the same. Billed by Jenna Taylor.                                 | Patrick Turner                         | \$100.00                       | 1.20             | \$120.00    |
| Time<br>12/31/2022<br>B210. Reviewing draft schedules.   | Patrick Turner                         | \$300.00                       | 2.20             | \$660.00    |
| Expenses   |  | Time Entries<br>Total          | 74.40            | \$17,100.00 |
| Expense  | Billed By                              | Price                          | Qty              | Sub         |
| E108<br>12/9/2022<br>Printing and Postage and Mailing Fees.  | Patrick Turner                         | \$236.67                       | 1.00             | \$236.67    |
| E108<br>12/9/2022<br>Printing and Postage and Mailing Fees.  | Patrick Turner                         | \$537.21                       | 1.00             | \$537.21    |

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Case 22-80860-BSK Doc 197 Filed 05/17/23 Entered 05/17/23 11:12:39 Desc Main Document Bill Page 18 of 36 Price Qty

Expenses Total: 2.00 \$773.88

| Total (USD)                 | \$17,873.88  |
|-----------------------------|--------------|
| Payment 1359 4/17/2023      | \$-14,453.88 |
| Transfer from Trust Account |              |
| Balance                     | \$3,420.00   |
| I-499 Previous Balance      | \$786.00     |
| Total Outstanding           | \$4,206.00   |
|                             |              |

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# Turner Legal Group, LLC

**INVOICE** 

139 S. 144TH STREET #665 Omaha, 68010 pturner@turnerlegalomaha.com/ https://turnerlegalomaha.com/ O: 4026903675

| Number     | 511                   |
|------------|-----------------------|
| Issue Date | 2/13/2023             |
| Due Date   | 3/15/2023             |
| Email      | amyburns@dimsrlvg.com |

# Bill To:

Amy Wilcox-Burns O: (402) 898-1079

#### Time Entries

| Time Entries  | Billed By      | Rate     | Hours | Sub      |
|---|----------------|----------|-------|----------|
| Time 1/2/2023 B110. Reviewing and revising schedules and SOFAs.   | Patrick Turner | \$300.00 | 1.10  | \$330.00 |
| Time 1/2/2023 B210. Addressing Champions 2004 exam issues.  | Patrick Turner | \$300.00 | 0.30  | \$90.00  |
| Time 1/3/2023 B210. Addressing Champions claim and related insurance issues.  | Patrick Turner | \$300.00 | 1.10  | \$330.00 |
| Time 1/3/2023 B110. Calls with Ms. Taylor re schedules and SOFA's.  | Patrick Turner | \$300.00 | 0.80  | \$240.00 |
| Time 1/3/2023 B110. Finalzing schedules and SOFAs.  | Patrick Turner | \$300.00 | 1.50  | \$450.00 |
| Time 1/3/2023 B110. Addressing E&S application to employ.   | Patrick Turner | \$300.00 | 0.70  | \$210.00 |
| Time 1/3/2023 B130. Addressing information request from Mr. Bailey re sale data.                                    | Patrick Turner | \$300.00 | 0.20  | \$60.00  |
| Time 1/3/2023 B130. Addressing information request from Mr. Peil.   | Patrick Turner | \$300.00 | 0.20  | \$60.00  |
| Time 1/3/2023 B210. Call and correspondence to and from Mr. Swanson and Mr. Catt re Champions information requests. | Patrick Turner | \$300.00 | 0.40  | \$120.00 |
| Time 1/3/2023 B210. Call with Mr. Knickrehm re DISL cc orders.  | Patrick Turner | \$300.00 | 0.30  | \$90.00  |
| Time 1/4/2023 B210. Call with Mr. Knickrehm re DISL cc orders.  | Patrick Turner | \$300.00 | 0.10  | \$30.00  |

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| Case 22-80860-BSK Doc 197 Filed 05 Time Entries Document  | 5/17/23 Ente<br>Bill <b>Pa</b> ge 20 o | red 05/17/23 11<br>of 36 Rate | .:12:39 D<br>Hours | esc Main<br>Sub |
|---|--|-------------------------------|--------------------|-----------------|
| Time<br>1/4/2023<br>B210. Finalzing and filing schedules.   | Patrick Turner                         | \$300.00                      | 0.80               | \$240.00        |
| Time<br>1/4/2023<br>B210. Addressing reinstatement of VR insurance policy.  | Patrick Turner                         | \$300.00                      | 0.30               | \$90.00         |
| Time<br>1/4/2023<br>B210. Addressing creditor inquiry for proof of BK filing.   | Patrick Turner                         | \$300.00                      | 0.30               | \$90.00         |
| Time<br>1/5/2023<br>B230. Call with Mr. Zluticky re CC.   | Patrick Turner                         | \$300.00                      | 0.20               | \$60.00         |
| Time 1/5/2023 B130. Continuing efforts to assist appraisers.  | Patrick Turner                         | \$300.00                      | 0.30               | \$90.00         |
| Time 1/5/2023 B130. Correspondence to and from Ms. Wilcox-Burns and Mr. Peil.   | Patrick Turner                         | \$300.00                      | 0.20               | \$60.00         |
| Time<br>1/5/2023<br>B110. Call with Mr. Jensen in UST's office.   | Patrick Turner                         | \$300.00                      | 0.30               | \$90.00         |
| Time<br>1/5/2023<br>B210. Call with Mr. Horn.   | Patrick Turner                         | \$300.00                      | 0.30               | \$90.00         |
| Time<br>1/6/2023<br>B210. Calls with Mr. Horn.  | Patrick Turner                         | \$300.00                      | 0.50               | \$150.00        |
| Time<br>1/6/2023<br>B210. Call with Mr. Knickrehm re DISL cc orders.  | Patrick Turner                         | \$300.00                      | 0.20               | \$60.00         |
| Time<br>1/6/2023<br>B110. Addressing IDI document requests.   | Patrick Turner                         | \$300.00                      | 0.70               | \$210.00        |
| Time<br>1/6/2023<br>B130. Initial review of possible Humboldt lien filings.   | Patrick Turner                         | \$300.00                      | 0.70               | \$210.00        |
| Time<br>1/6/2023<br>B130. Call with Mr. Land re asset sale.   | Patrick Turner                         | \$300.00                      | 0.30               | \$90.00         |
| Time 1/6/2023 B230. Addressing resolution of cash collateral hearing and objections.  | Patrick Turner                         | \$300.00                      | 2.70               | \$810.00        |
| Time 1/9/2023 B230. Preparing for and attending hearing on CC use.  | Patrick Turner                         | \$300.00                      | 2.10               | \$630.00        |
| Time 1/9/2023 B150. Attend 341 Meeting by Phone. Sent email to AWB. Had call with PT and review of schedules. Billed by Jenna Taylor. | Patrick Turner                         | \$100.00                      | 1.60               | \$160.00        |

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| Case 22-80860-BSK Doc 197 Filed 05 Time Entries Document  | 5/17/23 Ente<br>Bill <b>₽a</b> ge 21 c | ered 05/17/23 11<br>of 36 Rate | L:12:39<br>Hours | Desc Main |
|---|--|--------------------------------|------------------|-----------|
| Time 1/9/2023 B110. worked on draft operating reports for all 7 debtors and emails to AWB regarding the same. Billed by Jenna Taylor.   | Patrick Turner                         | \$100.00                       | 0.70             | \$70.00   |
| Time<br>1/9/2023<br>B210. Call regarding 341.   | Patrick Turner                         | \$300.00                       | 0.20             | \$60.00   |
| Time<br>1/9/2023<br>B210. Call with Mr. Knickrehm re DISL cc orders.  | Patrick Turner                         | \$300.00                       | 0.20             | \$60.00   |
| Time<br>1/9/2023<br>B210. Preparing for and attending 341.  | Patrick Turner                         | \$300.00                       | 1.90             | \$570.00  |
| Time<br>1/10/2023<br>B110. Addressing MOR preparations.   | Patrick Turner                         | \$300.00                       | 0.40             | \$120.00  |
| Time<br>1/10/2023<br>B110. Addressing outstanding IDI document requests.  | Patrick Turner                         | \$300.00                       | 0.40             | \$120.00  |
| Time 1/10/2023 B110. follow up on operating reports. Review of Dimensions Operating report and email to AWB. Follow up on amending schedules for missing or incomplete items. Billed by Jenna Taylor. | Patrick Turner                         | \$100.00                       | 0.80             | \$80.00   |
| Time 1/11/2023 B160. Categorizing of time entries for fee application. Billed by Jenna Taylor.  | Patrick Turner                         | \$100.00                       | 0.50             | \$50.00   |
| Time<br>1/11/2023<br>B210. Addressing efforts to resolve Champions document requests.   | Patrick Turner                         | \$300.00                       | 0.50             | \$150.00  |
| Time 1/11/2023 B110. Addressing IDI document requests and inquiries into same from UST.   | Patrick Turner                         | \$300.00                       | 0.60             | \$180.00  |
| Time<br>1/11/2023<br>B210. Call with Mr. Heiman re DISL strategy.   | Patrick Turner                         | \$300.00                       | 0.50             | \$150.00  |
| Time 1/12/2023 B210. Addressing multiple inquiries into status of insurance policies.   | Patrick Turner                         | \$300.00                       | 0.20             | \$60.00   |
| Time<br>1/12/2023<br>B210. Addressing and reviewing inquiry from Humboldt re Utility bills.   | Patrick Turner                         | \$300.00                       | 0.80             | \$240.00  |
| Time 1/12/2023 B110. Review of November Operating Reports. Discussion with PT and AWB. Discussion and follow up on amended schedules at needed. Billed by Jenna Taylor.                               | Patrick Turner                         | \$100.00                       | 0.70             | \$70.00   |
| Time<br>1/12/2023   | Patrick Turner                         | \$300.00                       | 0.90             | \$270.00  |

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B210. Reviewing November MORs.

| Case 22-80860-BSK Doc 197 Filed 05 Time Entries Document   | 5/17/23 Ente<br>□ <sup>Bill</sup> <b>Pa</b> ge 22 o | red 05/17/23 13<br>f 36 <sup>Rate</sup> | 1:12:39<br>Hours | Desc Main<br>Sub |
|--|---|---|------------------|------------------|
| Time<br>1/13/2023<br>B110. Calls with Ms. Taylor re schedules and SOFA's.  | Patrick Turner                                      | \$300.00                                | 0.90             | \$270.00         |
| Time<br>1/13/2023<br>B210. Addressing revisions to MOR.  | Patrick Turner                                      | \$300.00                                | 1.20             | \$360.00         |
| Time<br>1/13/2023<br>B210. Call regarding ongoing sale issues.   | Patrick Turner                                      | \$300.00                                | 0.40             | \$120.00         |
| Time 1/15/2023 B300. Review of Proof of Claims filed in all cases. Updated service list to match claims filed. Billed by Jenna Taylor. | Patrick Turner                                      | \$100.00                                | 1.00             | \$100.00         |
| Time<br>1/16/2023<br>B210. Addressing inquiry into status of insurance policies.   | Patrick Turner                                      | \$300.00                                | 0.20             | \$60.00          |
| Time<br>1/16/2023<br>B130. Addressing inquires re information request for possible sale.   | Patrick Turner                                      | \$300.00                                | 0.20             | \$60.00          |
| Time<br>1/16/2023<br>B110. Addressing fee application.   | Patrick Turner                                      | \$300.00                                | 0.90             | \$270.00         |
| Time<br>1/16/2023<br>B110. Addressing operating report.  | Patrick Turner                                      | \$300.00                                | 0.70             | \$210.00         |
| Time<br>1/16/2023<br>B230. Addressing ANB CC order and possible lien on Humboldt.  | Patrick Turner                                      | \$300.00                                | 0.60             | \$180.00         |
| Time<br>1/16/2023<br>B230. Addressing Berkadia CC order.   | Patrick Turner                                      | \$300.00                                | 0.20             | \$60.00          |
| Time<br>1/16/2023<br>B160. Drafting of December Monthly Fee Application and Exhibits.<br>Billed by Jenna Taylor.                       | Patrick Turner                                      | \$100.00                                | 1.30             | \$130.00         |
| Time<br>1/17/2023<br>B230. Reviewing Berkadia changes to CC order.   | Patrick Turner                                      | \$300.00                                | 0.30             | \$90.00          |
| Time<br>1/17/2023<br>B310. Beginning review of secured claim re ANB re Humboldt property.  | Patrick Turner                                      | \$300.00                                | 0.90             | \$270.00         |
| Time<br>1/17/2023<br>B230. Call with ANB counsel.  | Patrick Turner                                      | \$300.00                                | 0.10             | \$30.00          |
| Time<br>1/17/2023<br>B110. Reviewing Champions R2004 documents.  | Patrick Turner                                      | \$300.00                                | 0.50             | \$150.00         |
| Time<br>1/17/2023  | Patrick Turner                                      | \$300.00                                | 0.40             | \$120.00         |

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B130. Reviewing marketing documents and financial disclosures.

| Case 22-80860-BSK Do   |                  | 5/17/23 En<br>∷ <sup>Bill</sup> <b>₽a</b> ge 23 | tered 05/17/23<br>of 36 Rate | 3 11:12:39<br>Hours | Desc Main<br>Sub |
|--|------------------|---|------------------------------|---------------------|------------------|
| Time 1/17/2023 B210. Addressing inquiry from ANB re status of      | of insurance.    | Patrick Turner                                  | \$300.00                     | 0.20                | \$60.00          |
| Time 1/17/2023 B210. Call with Mr. Heiman re DISL issues.          |                  | Patrick Turner                                  | \$300.00                     | 0.20                | \$60.00          |
| Time 1/18/2023 B230. Revising Berkadia CC order.                   |                  | Patrick Turner                                  | \$300.00                     | 0.40                | \$120.00         |
| Time 1/19/2023 B230. Calls with Mr. Zluticky re CC motions.        |                  | Patrick Turner                                  | \$300.00                     | 0.20                | \$60.00          |
| Time 1/19/2023 B310. Beginning analysis of Champions claim         | o.               | Patrick Turner                                  | \$300.00                     | 1.50                | \$450.00         |
| Time 1/19/2023 B210. Addressing E&S employment application         |                  | Patrick Turner                                  | \$300.00                     | 0.60                | \$180.00         |
| Time 1/19/2023 B140. Addressing ANB CC order and paymen            |                  | Patrick Turner                                  | \$300.00                     | 0.60                | \$180.00         |
| Time 1/19/2023 B110. Addressing monthly fee statement.             |                  | Patrick Turner                                  | \$300.00                     | 0.50                | \$150.00         |
| Time<br>1/19/2023<br>B110. Addressing MOR inquiry from UST.        |                  | Patrick Turner                                  | \$300.00                     | 0.20                | \$60.00          |
| Time<br>1/20/2023<br>B210. Addressing inquiry from City of Humbol  | dt re utilities. | Patrick Turner                                  | \$300.00                     | 0.30                | \$90.00          |
| Time<br>1/20/2023<br>B230. Call with ANB counsel.                  |                  | Patrick Turner                                  | \$300.00                     | 0.10                | \$30.00          |
| Time<br>1/20/2023<br>B230. Finalizing ANB CC order.                |                  | Patrick Turner                                  | \$300.00                     | 0.60                | \$180.00         |
| Time<br>1/25/2023<br>B130. Addressing NDA request.                 |                  | Patrick Turner                                  | \$300.00                     | 0.30                | \$90.00          |
| Time<br>1/26/2023<br>B130. Addressing inquiry from Mr. Schnee re   | asset sale.      | Patrick Turner                                  | \$300.00                     | 0.30                | \$90.00          |
| Time<br>1/26/2023<br>B210. Call with Mr. Biehl re ANB claim issues |                  | Patrick Turner                                  | \$300.00                     | 0.20                | \$60.00          |
| Time<br>1/26/2023<br>B210. Call with Mr. Heiman DISL claim issues  |                  | Patrick Turner                                  | \$300.00                     | 0.30                | \$90.00          |
| Time<br>1/26/2023<br>B210. Call with Mr. Heiman DISL employment    |                  | Patrick Turner                                  | \$300.00                     | 0.10                | \$30.00          |

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|   | 5/17/23 Ente<br>t <sup>Bill</sup> <b>₽a</b> ge 24 o |          | 1:12:39<br>Hours | Desc Main |
|---|---|----------|------------------|-----------|
| Time 1/26/2023 B210. Addressing status and response to R2004 documents re Champions.                                    | Patrick Turner                                      | \$300.00 | 0.30             | \$90.00   |
| Time 1/26/2023 B230. Addressing payment issues re ANB adequate protection payments.                                     | Patrick Turner                                      | \$300.00 | 0.60             | \$180.00  |
| Time<br>1/27/2023<br>B210. Reviewing pleadings re application of stay in NE state court.                                | Patrick Turner                                      | \$300.00 | 0.90             | \$270.00  |
| Time<br>1/27/2023<br>B210. Addressing Champions discovery requests.   | Patrick Turner                                      | \$300.00 | 0.40             | \$120.00  |
| Time<br>1/29/2023<br>B210. Addressing and researching non-debtor stay.  | Patrick Turner                                      | \$300.00 | 0.90             | \$270.00  |
| Time 1/29/2023 B210. Reviewing motion to reconsider default judgment re Champions.                                      | Patrick Turner                                      | \$300.00 | 0.50             | \$150.00  |
| Time 1/30/2023 B110. Phone Conference with PT and follow up emails regarding outstanding issue. Billed by Jenna Taylor. | Patrick Turner                                      | \$100.00 | 0.50             | \$50.00   |
| Time<br>1/30/2023<br>B210. Reviewing champions documents re R2004 request.  | Patrick Turner                                      | \$300.00 | 1.80             | \$540.00  |
| Time<br>1/30/2023<br>B210. Finalizing application to employ E&S.  | Patrick Turner                                      | \$300.00 | 0.40             | \$120.00  |
| Time 1/30/2023 B210. Call with Mr. Reilly re Champions efforts to continue litigation re Mr. Ryan.                      | Patrick Turner                                      | \$300.00 | 0.20             | \$60.00   |
| Time<br>1/30/2023<br>B210. Call with Ms. Taylor re MORs.  | Patrick Turner                                      | \$300.00 | 0.40             | \$120.00  |
| Time<br>1/30/2023<br>B210. Call with Mr. Heiman re DISL.  | Patrick Turner                                      | \$300.00 | 0.40             | \$120.00  |
| Time<br>1/30/2023<br>B210. Call with Mr. Jensen re status of DISL issues.   | Patrick Turner                                      | \$300.00 | 0.20             | \$60.00   |
| Time<br>1/30/2023<br>B210. Addressing inquiry from Ms. Mohs as PC Ombudsman.  | Patrick Turner                                      | \$300.00 | 0.20             | \$60.00   |
| Time<br>1/30/2023<br>B210. Addressing request to allow Berkadia claim out of time.                                      | Patrick Turner                                      | \$300.00 | 0.30             | \$90.00   |
| Time<br>1/30/2023<br>B210. Call with Mr. Heiman re DISL et al status.   | Patrick Turner                                      | \$300.00 | 0.40             | \$120.00  |

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|   | /17/23 Entered 0<br>Bill <b>Pa</b> ge 25 of 36 | <b>5/17/23 11:1</b> Rate | L2:39<br>Hours | Desc Main |
|---|--|--------------------------|----------------|-----------|
| Time 1/30/2023  | Patrick Turner                                 | \$300.00                 | 0.30           | \$90.00   |
| B130. Addressing appraiser data inquiry re rates and occupancy.           |  |                          |                |           |
| Time  | Patrick Turner                                 | \$300.00                 | 0.30           | \$90.00   |
| 1/31/2023 B130. Addressing data room access requests.                     |  |                          |                |           |
| Time  | Patrick Turner                                 | \$300.00                 | 0.80           | \$240.00  |
| 1/31/2023 B210. Addressing amendments to MOR's requested by UST.          |  |                          |                |           |
| Time  | Patrick Turner                                 | \$300.00                 | 0.60           | \$180.00  |
| 1/31/2023<br>B210. Addressing response to R2004 exam.                     |  |                          |                |           |
| Time  | Patrick Turner                                 | \$300.00                 | 0.50           | \$150.00  |
| 1/31/2023 B210. Calls with Mr. Heiman re Champions issues.                |  |                          |                |           |
| Time  | Patrick Turner                                 | \$300.00                 | 0.30           | \$90.00   |
| 1/31/2023   |  |                          |                |           |
| B210. Finalzing and filing application to employ.                         |  |                          |                |           |
| Time 1/31/2023  | Patrick Turner                                 | \$100.00                 | 3.00           | \$300.00  |
| B110. December 2022 Operating Reports initial drafts for all debtors and  |  |                          |                |           |
| review of attachments and emails with AWB and PT. Billed by Jenna Taylor. |  |                          |                |           |

| \$15,410.00 | Total (USD)            |
|-------------|------------------------|
| \$0.00      | Paid                   |
| \$15,410.00 | Balance                |
| \$786.00    | I-499 Previous Balance |
| \$3,420.00  | I-500 Previous Balance |

Total Outstanding

58.10

Time Entries

Total

\$15,410.00

\$19,616.00

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# Turner Legal Group, LLC

**INVOICE** 

139 S. 144TH STREET #665 Omaha, 68010 pturner@turnerlegalomaha.com/ https://turnerlegalomaha.com/ O: 4026903675

# Number 521 Issue Date 3/16/2023 Due Date 4/15/2023 Email amyburns@dimsrlvg.com

## Bill To:

Amy Wilcox-Burns O: (402) 898-1079

## Time Entries

| Time Entries   | Billed By      | Rate     | Hours | Sub      |
|--|----------------|----------|-------|----------|
| Time 2/1/2023 B110. Continuation on December Operating Reports specifically section 2 and attachments and revisions as needed. Billed By Jenna Taylor.   | Patrick Turner | \$100.00 | 2.70  | \$270.00 |
| Time 2/1/2023 B160. Billing and Categorization of January Time for Fee Application and initial draft of January 2023 Monthly Application. Billed By Jenna Taylor.  | Patrick Turner | \$100.00 | 1.00  | \$100.00 |
| Time 2/2/2023 B110. Clarification on answers to section 7 on December Operating Reports and review of attachments to Operating Reports for accuracy. Billed By Jenna Taylor.   | Patrick Turner | \$100.00 | 0.50  | \$50.00  |
| Time 2/3/2023 B110. Discussion of December Operating Reports with PT. Review of revised December Forms after transfer of information. Email with AWB regarding January Operating Reports. Calculations of Cumulative totals for December Report. Redo of November Operating Reports into Nonsmall Business form. Billed By Jenna Taylor. | Patrick Turner | \$100.00 | 2.70  | \$270.00 |
| Time 2/6/2023 B110. Discussion of PT and AWB on revised and amended November and December Reports. Finalized Cumulative Totals. Finalized Amended November Reports in Non-small business form. Billed By Jenna Taylor.   | Patrick Turner | \$100.00 | 1.70  | \$170.00 |
| Time 2/6/2023 B110. Discussion with PT on Amended December Operating Reports Section 6 and emails with amended reports and changes as needed. Calculations of Part 6 cumulative totals for Nov and Dec Amended Reports. Billed By Jenna Taylor.  | Patrick Turner | \$100.00 | 1.00  | \$100.00 |
| Time 2/13/2023 B160. Drafting of January Fee Application and Exhibits. Billed By Jenna Taylor.   | Patrick Turner | \$100.00 | 1.00  | \$100.00 |

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| Case 22-80860-BSK Doc 197 Filed 05 Time Entries Document  | 5/17/23 Ente<br>Bill <b>®a</b> ge 27 ( | ered 05/17/23 11<br>of 36 Rate | :12:39<br>Hours | Desc Main |
|---|--|--------------------------------|-----------------|-----------|
| Time 2/21/2023 B110. January Operating Report review and revisions for all entities. Review of Attachments. Billed By Jenna Taylor. | Patrick Turner                         | \$100.00                       | 3.80            | \$380.00  |
| Time<br>2/1/2023<br>B210. Addressing R2004 examination issues and possible objections.  | Patrick Turner                         | \$305.00                       | 0.40            | \$122.00  |
| Time<br>2/1/2023<br>B210. Addressing revised MOR issues.  | Patrick Turner                         | \$305.00                       | 0.40            | \$122.00  |
| Time<br>2/1/2023<br>B210. Calls with Ms. Taylor re MORs.  | Patrick Turner                         | \$305.00                       | 0.40            | \$122.00  |
| Time<br>2/1/2023<br>B210. Reviewing order granting application to employ.   | Patrick Turner                         | \$305.00                       | 0.10            | \$30.50   |
| Time<br>2/1/2023<br>B210. Call with Mr. Biehl and Mr. Knickrehm re DISL cash collateral and<br>other issues.                        | Patrick Turner                         | \$305.00                       | 0.50            | \$152.50  |
| Time<br>2/1/2023<br>B210. Call with Ms. Burns re status of case.  | Patrick Turner                         | \$305.00                       | 0.50            | \$152.50  |
| Time<br>2/1/2023<br>B210. Continuing review of Champions Documents.   | Patrick Turner                         | \$305.00                       | 1.80            | \$549.00  |
| Time<br>2/2/2023<br>B210. Continuing analysis of Champions claim and objections to same.  | Patrick Turner                         | \$305.00                       | 1.10            | \$335.50  |
| Time<br>2/2/2023<br>B210. Calls with Ms. Taylor re MORs.  | Patrick Turner                         | \$305.00                       | 0.70            | \$213.50  |
| Time<br>2/2/2023<br>B210. Call with Mr. Heimann re Champions issues.  | Patrick Turner                         | \$305.00                       | 0.20            | \$61.00   |
| Time<br>2/2/2023<br>B210. Addressing inquiry re Village Ridge insurance.  | Patrick Turner                         | \$305.00                       | 0.20            | \$61.00   |
| Time<br>2/2/2023<br>B210. Addressing revised December MORs.   | Patrick Turner                         | \$305.00                       | 0.60            | \$183.00  |
| Time<br>2/2/2023<br>B210. Addressing Champions R2004 document issues.   | Patrick Turner                         | \$305.00                       | 0.60            | \$183.00  |
| Time<br>2/2/2023<br>B130. Status call with Mr. Peil.  | Patrick Turner                         | \$305.00                       | 0.40            | \$122.00  |
| Time<br>2/2/2023  | Patrick Turner                         | \$305.00                       | 0.40            | \$122.00  |

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B130. Addressing inquiries from creditors re sale status.

|  | d 05/17/23 Enter<br>nent <sup>Bill</sup> <b>₽a</b> ge 28 o | red 05/17/23 13<br>f 36 Rate | 1:12:39 D<br>Hours | esc Main<br>Sub |
|--|--|------------------------------|--------------------|-----------------|
| Time<br>2/3/2023<br>B210. Calls with Ms. Taylor re MORs.   | Patrick Turner   | \$305.00                     | 0.60               | \$183.00        |
| Time 2/3/2023 B210. Addressing revision to MORs per UST office.  | Patrick Turner   | \$305.00                     | 1.50               | \$457.50        |
| Time 2/5/2023 B130. Addressing potential bidder NDA.   | Patrick Turner   | \$305.00                     | 0.30               | \$91.50         |
| Time<br>2/6/2023<br>B210. Addressing January MOR operations.   | Patrick Turner   | \$305.00                     | 0.70               | \$213.50        |
| Time 2/6/2023 B210. Call with Mr. Heiman re DISL subpoena issues.  | Patrick Turner   | \$305.00                     | 0.10               | \$30.50         |
| Time 2/6/2023 B210. Call with Ms. Taylor re MORs.  | Patrick Turner   | \$305.00                     | 0.30               | \$91.50         |
| Time 2/6/2023 B210. Addressing Berkadia inquiry re service procedures.                                   | Patrick Turner   | \$305.00                     | 0.30               | \$91.50         |
| Time 2/6/2023 B110. review of claims register to update service list. Updating of service list to today. | Patrick Turner   | \$100.00                     | 1.10               | \$110.00        |
| Time 2/7/2023 B210. Call with Ms. Taylor re MORs.  | Patrick Turner   | \$305.00                     | 0.20               | \$61.00         |
| Time 2/7/2023 B140. Addressing bidding procedures motion and related filings.                            | Patrick Turner   | \$305.00                     | 2.10               | \$640.50        |
| Time 2/7/2023 B210. Continuing analysis of draft revised MORs.   | Patrick Turner   | \$305.00                     | 0.90               | \$274.50        |
| Time 2/7/2023 B130. Addressing new asset purchase inquiries and NDA issues.                              | Patrick Turner   | \$305.00                     | 0.90               | \$274.50        |
| Time 2/8/2023 B130. Revising bidding procedures.   | Patrick Turner   | \$305.00                     | 1.10               | \$335.50        |
| Time<br>2/8/2023<br>B130. Reviewing NDAs.  | Patrick Turner   | \$305.00                     | 0.20               | \$61.00         |
| Time 2/8/2023 B210. Reviewing protective order motion.   | Patrick Turner   | \$305.00                     | 0.30               | \$91.50         |
| Time 2/10/2023 B130. Addressing asset sale and NDA issues.   | Patrick Turner   | \$305.00                     | 0.30               | \$91.50         |
| Time 2/10/2023   | Patrick Turner   | \$305.00                     | 0.20               | \$61.00         |

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B130. Call with Mr. Biehl re CC issues.

| Case 22-80860-BSK Do  | oc 197 Filed 05/<br>Document | /17/23 Ento<br>Bill <b>®å</b> ge 29 | ered 05/17/23 11<br>of 36 <sup>Rate</sup> | :12:39<br>Hours | Desc Main<br>Sub |
|---|------------------------------|-------------------------------------|---|-----------------|------------------|
| Time<br>2/10/2023<br>B140. Addressing ANB cash collateral issues            | s and stipulation.           | Patrick Turner                      | \$305.00                                  | 0.80            | \$244.00         |
| Time 2/12/2023<br>B130. Correspondence to and from Mr. Riley update.        | and Mr. Biehl re status      | Patrick Turner                      | \$305.00                                  | 0.30            | \$91.50          |
| Time<br>2/13/2023<br>B210. Addressing issues re Champions R200              | 04 exam.                     | Patrick Turner                      | \$305.00                                  | 0.30            | \$91.50          |
| Time<br>2/13/2023<br>B210. Addressing DISL et al insurance status           | s.                           | Patrick Turner                      | \$305.00                                  | 0.30            | \$91.50          |
| Time<br>2/13/2023<br>B110. Addressing fee application.                      |                              | Patrick Turner                      | \$305.00                                  | 0.80            | \$244.00         |
| Time<br>2/14/2023<br>B110. Finalzing and filing amended MORs.               |                              | Patrick Turner                      | \$305.00                                  | 1.10            | \$335.50         |
| Time<br>2/14/2023<br>B140. Preparing for and attending status call<br>sale. | with ANB and B. Riley re     | Patrick Turner                      | \$305.00                                  | 0.80            | \$244.00         |
| Time 2/14/2023 B130. Reviewing revised CC stipulation with A                | ANB.                         | Patrick Turner                      | \$305.00                                  | 0.30            | \$91.50          |
| Time<br>2/15/2023<br>B140. Revising lease assumption motion.                |                              | Patrick Turner                      | \$305.00                                  | 1.50            | \$457.50         |
| Time<br>2/16/2023<br>B140. Correspondence to and from Mr. Peil a<br>sale.   | and Mr. Bailey re asset      | Patrick Turner                      | \$305.00                                  | 0.20            | \$61.00          |
| Time<br>2/16/2023<br>Finalzing and filing bidding procedures and le         | ease assumption motions.     | Patrick Turner                      | \$305.00                                  | 1.70            | \$518.50         |
| Time<br>2/17/2023<br>B210. Researching ERC tax credit issues.               |                              | Patrick Turner                      | \$305.00                                  | 0.80            | \$244.00         |
| Time<br>2/17/2023<br>B310. Reviewing Berkadia Claim.                        |                              | Patrick Turner                      | \$305.00                                  | 0.80            | \$244.00         |
| Time 2/17/2023 B210. Reviewing ANB escrow account history                   | y.                           | Patrick Turner                      | \$305.00                                  | 0.80            | \$244.00         |
| Time<br>2/17/2023<br>B110. Addressing draft of January MORs.                |                              | Patrick Turner                      | \$305.00                                  | 0.90            | \$274.50         |
| Time 2/17/2023 P140 Addressing service issues to asset sal                  |                              | Patrick Turner                      | \$305.00                                  | 0.40            | \$122.00         |

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B140. Addressing service issues re asset sale.

| Case 22-80860-BSK Doc 197 Filed 05 Time Entries Document   | 5/17/23 Ente   | ered 05/17/23 11<br>of 36 <sup>Rate</sup> | :12:39 D<br>Hours | Desc Main<br>Sub |
|--|----------------|---|-------------------|------------------|
| Time 2/17/2023 B210. Reviewing and analyzing Champions issues related to Motion for Protective Order and resolution of same. | Patrick Turner | \$305.00                                  | 0.40              | \$122.00         |
| Time 2/17/2023 B140. Addressing inquiry from Mr. Bailey re asset sale and bidding procedures.                                | Patrick Turner | \$305.00                                  | 0.40              | \$122.00         |
| Time<br>2/17/2023<br>B210. Calls with Mr. Heiman re DISL status.   | Patrick Turner | \$305.00                                  | 0.50              | \$152.50         |
| Time 2/17/2023 B210. Call with Mr. and Mrs. Burns re DISL update.  | Patrick Turner | \$305.00                                  | 0.50              | \$152.50         |
| Time 2/20/2023 B210. Addressing and reviewing status of Champions requests and protective order issues and resolution.       | Patrick Turner | \$305.00                                  | 0.60              | \$183.00         |
| Time 2/21/2023 B210. Reviewing draft January MORs.   | Patrick Turner | \$305.00                                  | 1.60              | \$488.00         |
| Time 2/21/2023 B130. Call with ANB counsel re CC issues.   | Patrick Turner | \$305.00                                  | 0.20              | \$61.00          |
| Time 2/21/2023 B130. Call with Mr. Biehl re CC stipulation and related issues.   | Patrick Turner | \$305.00                                  | 0.20              | \$61.00          |
| Time 2/22/2023 Reviewing and analyzing Ombudsman reports.  | Patrick Turner | \$305.00                                  | 1.10              | \$335.50         |
| Time 2/23/2023 B140. Reviewing revisions to NDA and addressing inquiry into same.  | Patrick Turner | \$305.00                                  | 0.40              | \$122.00         |
| Time 2/23/2023 B210. Addressing inquiry from Mr. Small re ACH agreement.   | Patrick Turner | \$305.00                                  | 0.30              | \$91.50          |
| Time 2/23/2023 B140. Call with Mr. Land re Columbia Sale.  | Patrick Turner | \$305.00                                  | 0.30              | \$91.50          |
| Time 2/23/2023 B140. Call with Mr. Land re Columbia Sale.  | Patrick Turner | \$305.00                                  | 0.10              | \$30.50          |
| Time 2/24/2023 B210. Addressing status of Columbia insurance.  | Patrick Turner | \$305.00                                  | 0.40              | \$122.00         |
| Time 2/27/2023 B140. Addressing revised NDAs and reviewing status of sale process.   | Patrick Turner | \$305.00                                  | 0.80              | \$244.00         |
| Time 2/27/2023 Finalzing and filing MORs.  | Patrick Turner | \$305.00                                  | 1.40              | \$427.00         |

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| Case 22-80860-BSK Time Entries                             |         | Filed 05/17/23 Enter<br>Occument Bill Page 31 of |                       | 1:12:39 D<br>Hours | Desc Main   |
|--|---------|--|-----------------------|--------------------|-------------|
| Time<br>2/28/2023<br>B210. Call with Mr. Hermanek re ERC ( | claims. | Patrick Turner                                   | \$305.00              | 0.30               | \$91.50     |
| Time 2/28/2023 B210. Researching ERC claim issues.         |         | Patrick Turner                                   | \$305.00              | 0.80               | \$244.00    |
| Time 2/28/2023 B130. Reviewing changes to NDAs.            |         | Patrick Turner                                   | \$305.00              | 0.80               | \$244.00    |
|  |         |  | Time Entries<br>Total | 56.70              | \$14,116.00 |
| Expenses   |         |  |                       |                    |             |
| Expense  |         | Billed By  | Price                 | Qty                | Sub         |
| Postage 2/17/2023  |         | Patrick Turner                                   | \$494.94              | 1.00               | \$494.94    |
|  |         |  | Expenses Total:       | 1.00               | \$494.94    |

| \$14,610.94 | Total (USD)            |
|-------------|------------------------|
| \$0.00      | Paid                   |
| \$14,610.94 | Balance                |
| \$786.00    | I-499 Previous Balance |
| \$3,420.00  | I-500 Previous Balance |
| \$15,410.00 | I-511 Previous Balance |
| \$34,226.94 | Total Outstanding      |
|             |                        |

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# Turner Legal Group, LLC

**INVOICE** 

139 S. 144TH STREET #665 Omaha, 68010 pturner@turnerlegalomaha.com/ https://turnerlegalomaha.com/ O: 4026903675

# Number 533 Issue Date 4/17/2023 Due Date 5/17/2023 Email amyburns@dimsrlvg.com

## Bill To:

Amy Wilcox-Burns O: (402) 898-1079

## Time Entries

| Time Entries   | Billed By      | Rate     | Hours | Sub      |
|--|----------------|----------|-------|----------|
| Time 3/8/2022 B160. February Fee Application Draft and Time Entries categorized, discussion with PT regarding sale procedures and email to PT and PH regarding fee applications. Billed by Jenna Taylor. | Patrick Turner | \$100.00 | 1.20  | \$120.00 |
| Time 3/1/2023 B140. Addressing revisions to NDA.   | Patrick Turner | \$310.00 | 0.60  | \$186.00 |
| Time 3/1/2023 B210. Addressing possible ERC claims.  | Patrick Turner | \$310.00 | 0.30  | \$93.00  |
| Time 3/2/2023 Addressing revisions to Paul Land engagement and sale.   | Patrick Turner | \$310.00 | 0.90  | \$279.00 |
| Time 3/3/2023 B140. Call with Mr. Whaley re bidding procedures.  | Patrick Turner | \$310.00 | 0.20  | \$62.00  |
| Time 3/3/2023 B210. Addressing UST inquiry re status of insurance.   | Patrick Turner | \$310.00 | 0.20  | \$62.00  |
| Time<br>3/3/2023<br>B210. Addressing ACH renewal.  | Patrick Turner | \$310.00 | 0.70  | \$217.00 |
| Time 3/3/2023 B140. Continuing to address revisions to Columbia listing agreement.   | Patrick Turner | \$310.00 | 0.50  | \$155.00 |
| Time 3/8/2023 B210. Reviewing MO AG letter re claims.  | Patrick Turner | \$310.00 | 0.30  | \$93.00  |
| Time 3/9/2023 B210. Addressing bidding procedures objection and resolutions to same.   | Patrick Turner | \$310.00 | 0.80  | \$248.00 |
| Time<br>3/9/2023<br>B140. Addressing sale inquiry from third party.  | Patrick Turner | \$310.00 | 0.20  | \$62.00  |

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|   | 5/17/23 Ente<br>t <sup>Bill</sup> <b>₽a</b> ge 33 o | red 05/17/23 13<br>f 36 Rate | L:12:39 D<br>Hours | esc Main<br>Sub |
|---|---|------------------------------|--------------------|-----------------|
| Time<br>3/9/2023<br>B140. Addressing revisions to NDA.  | Patrick Turner                                      | \$310.00                     | 0.40               | \$124.00        |
| Time 3/10/2023 B210. Addressing lease assumption motion order.  | Patrick Turner                                      | \$310.00                     | 0.30               | \$93.00         |
| Time 3/10/2023 B210. Addressing ERC analysis.   | Patrick Turner                                      | \$310.00                     | 0.20               | \$62.00         |
| Time 3/10/2023 B140. Preparing for and participating in call with banks and broker re asset sale updates.   | Patrick Turner                                      | \$310.00                     | 0.60               | \$186.00        |
| Time 3/10/2023<br>B140. Drafting bidding procedures order.  | Patrick Turner                                      | \$310.00                     | 2.40               | \$744.00        |
| Time 3/13/2023 B160. Drafting of Erickson Soderstrum first monthly application. Categorized all time entries into ABA categories for November 22 2022 to February 28 2023. Conference with PT regarding status. Review of docket sheet and bidding procedures motion. Billed by Jenna Taylor. | Patrick Turner                                      | \$100.00                     | 2.50               | \$250.00        |
| Time 3/13/2023 B140. Revising bidding procedures order.   | Patrick Turner                                      | \$310.00                     | 1.20               | \$372.00        |
| Time 3/13/2023 B210. Reviewing E&S fee application.   | Patrick Turner                                      | \$310.00                     | 0.70               | \$217.00        |
| Time 3/13/2023 B210. Addressing status of Iowa litigation and stay implications.  | Patrick Turner                                      | \$310.00                     | 0.40               | \$124.00        |
| Time 3/13/2023 B210. Call with Ms. Taylor re MORs and fee applications.   | Patrick Turner                                      | \$310.00                     | 0.30               | \$93.00         |
| Time 3/14/2023 B110. Review of all claims reports for all 7 cases in order to update service list. Billed by Jenna Taylor.  | Patrick Turner                                      | \$100.00                     | 1.20               | \$120.00        |
| Time 3/15/2023 B140. Call with Mr. Zluticky re bidding procedures.  | Patrick Turner                                      | \$310.00                     | 0.10               | \$31.00         |
| Time 3/15/2023 B130. Addressing missing Berkadia payments.  | Patrick Turner                                      | \$310.00                     | 0.30               | \$93.00         |
| Time 3/15/2023 B210. Status call with Mr. Burns.  | Patrick Turner                                      | \$310.00                     | 0.40               | \$124.00        |
| Time 3/15/2023 B140. Addressing Columbia sale issues.   | Patrick Turner                                      | \$310.00                     | 0.80               | \$248.00        |
| Time 3/15/2023  | Patrick Turner                                      | \$310.00                     | 0.50               | \$155.00        |

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B130. Addressing revised ANB cash collateral order.

|   | 5/17/23 Enter<br>t Bill <b>Pa</b> ge 34 of | ed 05/17/23 11<br>36 Rate | 1:12:39  <br>Hours | Desc Main<br>Sub |
|---|--|---------------------------|--------------------|------------------|
| Time 3/16/2023 B160. 3RD Monthly Fee App. Drafting of Application and gathering information for Exhibit A and B including calculating categories and time totals. Billed by Jenna Taylor. | Patrick Turner                             | \$100.00                  | 2.10               | \$210.00         |
| Time 3/16/2023 B210. Call with Ms. Taylor re MORs and fee applications.   | Patrick Turner                             | \$310.00                  | 0.50               | \$155.00         |
| Time 3/16/2023 B140. Addressing asset sale inquiry.   | Patrick Turner                             | \$310.00                  | 0.20               | \$62.00          |
| Time 3/17/2023 B140. Call with Mr. Whaley re bidding procedures.  | Patrick Turner                             | \$310.00                  | 0.10               | \$31.00          |
| Time 3/17/2023 B140. Addressing asset sale inquiry.   | Patrick Turner                             | \$310.00                  | 0.20               | \$62.00          |
| Time 3/17/2023 B110.February Operating Reports. Billed by Jenna Taylor.   | Patrick Turner                             | \$100.00                  | 1.80               | \$180.00         |
| Time 3/19/2023 B140. Addressing Columbia sale issues.   | Patrick Turner                             | \$310.00                  | 0.30               | \$93.00          |
| Time 3/20/2023 B140. Addressing changes and revisions to bidding procedures order.  | Patrick Turner                             | \$310.00                  | 1.30               | \$403.00         |
| Time 3/20/2023 B210. Initial review of Feb MORs.  | Patrick Turner                             | \$310.00                  | 0.80               | \$248.00         |
| Time 3/20/2023 B210. Court hearing re Status Hearing and Bidding Procedures.  | Patrick Turner                             | \$310.00                  | 0.20               | \$62.00          |
| Time 3/20/2023 B140. Addressing Columbia real estate sale issues.   | Patrick Turner                             | \$310.00                  | 0.40               | \$124.00         |
| Time 3/21/2023 B210. Status call with Mr. Biehl.  | Patrick Turner                             | \$310.00                  | 0.40               | \$124.00         |
| Time 3/21/2023 B140. Addressing inquiry from prospective buyer re sale deadlines.   | Patrick Turner                             | \$310.00                  | 0.20               | \$62.00          |
| Time 3/21/2023 B210. Addressing E&S fee application.  | Patrick Turner                             | \$310.00                  | 0.70               | \$217.00         |
| Time 3/21/2023 B130. Addressing changes to CC order with ANB.   | Patrick Turner                             | \$310.00                  | 0.80               | \$248.00         |
| Time 3/21/2023 B140. Addressing Paul Land application to employ.  | Patrick Turner                             | \$310.00                  | 0.80               | \$248.00         |

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|  | 5/17/23 Ente<br>Bill <b>₽ a</b> ge 35 c | ered 05/17/23 11<br>of 36 Rate | L:12:39<br>Hours | Desc Main<br>Sub |
|--|---|--------------------------------|------------------|------------------|
| Time<br>3/21/2023<br>B140. Addressing Columbia real estate sale issues and call with Mr.<br>Land.  | Patrick Turner                          | \$310.00                       | 0.50             | \$155.00         |
| Time<br>3/22/2023<br>B140. Addressing Columbia real estate sale issues.  | Patrick Turner                          | \$310.00                       | 0.20             | \$62.00          |
| Time<br>3/22/2023<br>B210. Addressing revisions to E&S fee application.  | Patrick Turner                          | \$310.00                       | 0.20             | \$62.00          |
| Time<br>3/22/2023<br>B140. Addressing Berkadia changes to bidding procedures order.  | Patrick Turner                          | \$310.00                       | 0.40             | \$124.00         |
| Time<br>3/23/2023<br>B130. Call with Mr. Biehl re CC issues.   | Patrick Turner                          | \$310.00                       | 0.20             | \$62.00          |
| Time 3/24/2023 B140. Addressing and reviewing Columbia purchase agreement offers.  | Patrick Turner                          | \$310.00                       | 0.80             | \$248.00         |
| Time<br>3/24/2023<br>B310. Reviewing claims.   | Patrick Turner                          | \$310.00                       | 1.30             | \$403.00         |
| Time<br>3/24/2023<br>B210. Reviewing E&S fee app as revised.   | Patrick Turner                          | \$310.00                       | 0.30             | \$93.00          |
| Time 3/24/2023 B140. Addressing broker inquiry on status of bidding procedures process.  | Patrick Turner                          | \$310.00                       | 0.30             | \$93.00          |
| Time<br>3/24/2023<br>B130. Addressing Berkadia payment issues and resolving same.  | Patrick Turner                          | \$310.00                       | 0.30             | \$93.00          |
| Time 3/25/2023 B160. Revisions to Fee App of Erickson Sederstrom including exhibits for categorization of time entries to ABA and Totals by individuals. Billed by Jenna Taylor. | Patrick Turner                          | \$100.00                       | 1.10             | \$110.00         |
| Time<br>3/27/2023<br>B140. Addressing Columbia property purchase offers.   | Patrick Turner                          | \$310.00                       | 0.60             | \$186.00         |
| Time<br>3/27/2023<br>B210. Reviewing materials related to VP and VR ACH agreements.  | Patrick Turner                          | \$310.00                       | 0.40             | \$124.00         |
| Time<br>3/28/2023<br>B210. Reviewing VP insurance claim and repair issues.   | Patrick Turner                          | \$310.00                       | 0.40             | \$124.00         |
| Time<br>3/28/2023<br>B210. Finalzing and filing February MORs.   | Patrick Turner                          | \$310.00                       | 0.80             | \$248.00         |
| Time<br>3/29/2023  | Patrick Turner                          | \$310.00                       | 0.40             | \$124.00         |

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B140. Addressing asset sale bid and appraisal issues.

| Case 22-80860-BSK                         |         | Filed 05/17/23<br>ocument Bill Page |                       | 3 11:12:39<br>Hours | Desc Main<br>Sub |
|---|---------|-------------------------------------|-----------------------|---------------------|------------------|
| Time                                      |         | Patrick Turn                        | er \$310.00           | 0.20                | \$62.00          |
| 3/29/2023                                 |         |                                     |                       |                     |                  |
| B210. Addressing UST inquiry re quarterly | y fees. |                                     |                       |                     |                  |
| Time                                      |         | Patrick Turn                        | er \$310.00           | 0.20                | \$62.00          |
| 3/29/2023                                 |         |                                     |                       |                     |                  |
| B310. Reviewing IRS claim.                |         |                                     |                       |                     |                  |
| Time                                      |         | Patrick Turn                        | er \$310.00           | 0.40                | \$124.00         |
| 3/30/2023                                 |         |                                     |                       |                     |                  |
| B210. Addressing fee procedures stateme   | ents.   |                                     |                       |                     |                  |
| Time                                      |         | Patrick Turn                        | er \$310.00           | 0.10                | \$31.00          |
| 3/31/2023                                 |         |                                     |                       |                     |                  |
| B210. Call with Mr. Burns.                |         |                                     |                       |                     |                  |
| Time                                      |         | Patrick Turn                        | er \$310.00           | 0.40                | \$124.00         |
| 3/31/2023                                 |         |                                     |                       |                     |                  |
| B140. Call with Mr. Land re Columbia sale | e.      |                                     |                       |                     |                  |
|   |         |                                     | Time Entries<br>Total | 38.50               | \$9,856.00       |

| \$9,856.00  |
|-------------|
| \$0.00      |
| \$9,856.00  |
| \$786.00    |
| \$3,420.00  |
| \$15,410.00 |
| \$14,610.94 |
| \$44,082.94 |
|             |

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